

OCT 30 1997

CERTIFIED MAIL

Return Receipt Requested

Article Number: Z 019 233 482

Mr. Rick Meyer
Sheller-Globe Corporation,
c/o United Technologies Corporation (UTC)
United Technologies Building
Hartford, Connecticut 06101

Dear Mr. Meyer:

RE: Former Sheller-Globe Facility
3200 Main Street
Keokuk, Iowa
Consent Order [Docket No. VII-91-H-0040]



R00073737
RCRA Records Center

Letter of Warning

We have reviewed correspondence submitted on behalf of United Technologies Automotive Systems (UTAS) dated October 28, 1997. The U.S. Environmental Protection Agency (EPA) offers the following comments:

1. The Consent Order requires submittals to be by Respondents, not just one party.
2. Section XI of the Consent Order requires Respondents to provide EPA 10 days notice prior to engaging in any field activities, such as well drilling, installation of equipment, or sampling. EPA did not receive 10 days notice to the October 16, 1997 sampling event.
3. EPA does not concur with UTAS's method of setting clean-up levels based upon sampling and still producing hypothetically calculated clean-up numbers.

Please be aware that future failure to comply with the Consent Order may result in the assessment of penalties against Respondents. Please note that EPA Counsel may also be sending a letter regarding this matter.

Please contact me at the letterhead address or by telephone at (913) 551-7633 if you have any questions or comments regarding this matter.

Sincerely,

Brian Mitchell
Iowa RCRA and State Programs
Air, RCRA and Toxics Division

cc: Dale Guariglia, Esq., Bryan Cave LLP
Schlegel Sealing Systems, Inc, c/o Kevin Condon, Esq, BTR Inc.
Joseph A. Gregg, Esq, Eastman & Smith

bcc: Howard Bunch, CNSL

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10/30/97

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 30 1997

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

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